

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
UNITED STATES OF AMERICA,

-against-

**NOTICE OF MOTION**  
16 Cr 50 (DLI)

CHARLES THOMAS,

Defendant.  
-----X

PLEASE TAKE NOTICE, that upon the annexed declaration of JOYCE C. LONDON, Esq., the accompanying memorandum of law, the indictment and all prior proceedings and pleadings had herein, the defendant, CHARLES THOMAS, by his attorney, JOYCE C. LONDON, Esq. will move this United States District Court for the Southern District of New York before the Honorable Dora L. Irizarry at a date and time convenient to the Court, at the United States District Courthouse, Eastern District of New York, 225 Cadman Plaza East, Brooklyn, NY 11201 for the following relief:

1. An order pursuant to Rule 12(b)(3) of the Federal Rules of Criminal Procedure directing the Government to disclose to the defendant any and all acts which the Government would seek to introduce against the defendant pursuant to Federal Rule of Evidence 404(b) in such sufficient and reasonable time that the defendant may make a further motion *in limine* to preclude the introduction of such evidence;
- (2) An order permitting defendant to make such other and further motions *in limine* as may be appropriate, including but not limited to motions *in limine* upon the production of additional discovery materials and/or the production of 3500 materials prior to trial;

(3) For such other and further relief which this Court may deem just and proper.

Yours etc.,

/s/

JOYCE C. LONDON  
59 Maiden Lane, 6<sup>th</sup> Floor  
New York, New York 10038  
Tel: (212) 964-3700  
[jlondonlaw@aol.com](mailto:jlondonlaw@aol.com)

*Attorney for Defendant*  
*CHARLES THOMAS*

To: Clerk of the Court (By ECF)  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Honorable Dora L. Irizarry  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Karthik Srinivasan, Esq.  
Assistant United States Attorney  
Eastern District of New York  
271 Cadman Plaza East  
Brooklyn, NY 11201

Mr. Charles Thomas